

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
)	
v.)	CRIMINAL NO. 19-cr-10459
)	
ROBERT AVITABLE.)	
)	
)	

**DEFENDANT’S ASSENTED TO MOTION FOR ADDITIONAL TIME
TO ARRANGE MANAGEMENT OF THE PROPERTIES**

Now comes the Defendant who moves this Honorable Court for additional time, up until January 30, 2020, for a third party to take over management of the building identified in the Release Agreement. As reason therefore, the Defendant states:

1. At the time of his release with conditions, the government and defendant entered a stipulation that required the defendant to secure a third party within two weeks to maintain and manage three properties identified as Tallman Street, Sawyer Street and North Front Street in New Bedford.

2. After his release the Defendant discovered the subject properties were in disarray and disrepair due to the investigative searches that took place, as well as subsequent tenant activity. The Defendant has since his release continued to repair and restore the buildings, and to maintain the buildings in order to maintain their habitability by lawful tenants.

3. Additional time is needed to complete the cleanup and renovation of the buildings prior to procuring a third party manager.

4. The government assents to the additional time, until January 31, 2020.

Respectfully Submitted,

ROBERT AVITABLE

By his attorney,

/s/ Victoria Kelleher

Victoria Kelleher
1 Marina Park Drive
Suite 1410
Boston MA 02210

Date: December 23, 2019

Certificate of Service

I, Victoria Kelleher, attorney of record for the defendant, do hereby state that I have provided a copy of the Defendant's Motion to Continue on all the parties by efile this day.

Signed,

/s/ Victoria Kelleher

Victoria Kelleher